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VIA ELECTRONIC FILING

The Honorable Andre M. Davis
United States District Judge
United States District Court for the District of Maryland
Garmatz Courthouse
101 West Lombard Street, Room 530
Baltimore, Maryland 21201

Re: *Kurchatov v. Western Services Corporation, et al.*
In the United States District Court for the District of Maryland
Case No. AMD 02 CV3878

Dear Judge Davis:

We write to inform the Court of the parties' most recent efforts to resolve the ongoing discovery disputes previously detailed in Kurchatov's Motion to Compel. On September 29, 2003, at approximately 2:40 p.m., counsel for Kurchatov and Western Services Corporation spoke regarding these issues, and reached agreement as to some, but less than all of the outstanding issues. WSC again agreed to produce some of the software requested, namely, versions of SimPort as they were provided to the power plants. Additionally, WSC, for the first time, agreed to produce certain limited time records pertaining to efforts made by "former" KI employees on the development of WSC's allegedly independent SimPort.¹ The remaining substantive issues between the parties are unchanged and appear ripe for this Court's consideration.

¹ WSC seems to contend that no time records exist prior to the year 2000, which is surprising given WSC's contention that the Russian scientists were actually WSC's employees since 1997.

Respectfully submitted,

/s/

Jesse B. Hammock

JBH:cld

cc: Charles L. Simmons, Esquire
Margaret A. Keeley, Esquire